

TH:MWG
F. #2020R00800

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JOHN PORCELLO,
also known as "Johnny Pizza,"
and
RONALD SEEBECK,

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Extortionate Extension of Credit Conspiracy)

1. In or about and between September 2016 and August 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOHN PORCELLO, also known as "Johnny Pizza," and RONALD SEEBECK, together with others, did knowingly and intentionally conspire to make one or more extortionate extensions of credit.

(Title 18, United States Code, Sections 892(a) and 3551 et seq.)

COUNT TWO

(Extortionate Collection of Credit Conspiracy)

2. In or about and between September 2016 and August 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOHN PORCELLO, also known as "Johnny Pizza," and RONALD SEEBECK,

I N D I C T M E N T

1:22-cr-00029(KAM)(CLP)

Cr. No. _____

(T. 18, U.S.C., §§ 892(a), 894(a),
981(a)(1)(C), 1955(a), 1955(d), 2 and
3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

together with others, did knowingly and intentionally conspire to use extortionate means to collect one or more extensions of credit, and to punish one or more persons for the nonpayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT THREE
(Illegal Gambling)

3. In or about and between September 2020 and April 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOHN PORCELLO, also known as “Johnny Pizza,” and RONALD SEEBECK, together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit: a gambling business involving sports betting, which operated in violation of the laws of New York State, to wit: New York Penal Law Sections 225.05 and 20.00, and which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of at least \$2,000 in one or more single days.

(Title 18, United States Code, Sections 1955(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

4. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such

offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

6. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Section 1955(d),

which provides for the forfeiture of any property, including money, used in violation of Title 18, United States Code, Section 1955.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2020R00800
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JOHN PORCELLO and RONALD SEEBECK,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 892(a), 894(a), 981(a)(1)(C), 1955(a), 1955(d), 2 and
3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Michael W. Gibaldi, Assistant U.S. Attorney (718) 254-6067